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8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA

11 Case No. C04-0098-SI

12 EDWARD ALVARADO, et al,

13 Plaintiffs,

14 v.

15 FEDEX CORPORATION,

16 Defendants.
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PLAINTIFF'S LIST OF WITNESSES

Date: October 10, 2006

Time: 3:30 p.m.

Judge: Hon. Susan Illston

1 Plaintiff Charlotte Boswell, pursuant to the Court's Pre-Trial Instructions hereby submit a
 2 list of witnesses likely to be called at trial, other than solely for impeachment or rebuttal.

WITNESSES	SUBSTANCE OF TESTIMONY
PEGGY REARDON	Human Resources Representative. Ms. Reardon had conversations with Plaintiff regarding her Discrimination Complaints against Stites. Ms. Reardon will testify to FedEx EEO Policies re harassment, retaliation, and discrimination.
SHARON MCNEIL	Human Resources Representative. Ms. McNeil had several conversations with Plaintiff regarding acts of Retaliation (her checks not given to her by Stites and delays).
NORMAN STITES	Mr. Stites is Plaintiff's Operation. Manager. Plaintiff has alleged that Mr. Stites discriminated against Plaintiff and retaliated against Plaintiff after she complained of harassment/discrimination. Stites will speak to the operations at the Edes Facility in Oakland, job classifications of which Plaintiff worked. Stites will testify to others that he managed and harassed during his employment at FedEx.
Debbie Ingram	Ms. Ingram is a co-worker of Plaintiff, in the

1		same classification as Plaintiff. Ms. Ingram
2		will testify to that she worked at Fed Ex during
3		the period in question in this case. Ms. Ingram
4		will testify that Norman Stites, her manager,
5		made sexual advances toward her and Plaintiff
6		on numerous occasions, including during
7		workgroup meetings. Ms. Ingram will testify
8		that she and Plaintiff met Stites together and
9		complained directly to him about his
10		inappropriate sexual behavior. Ms. Ingram
11		observed Stites kiss Plaintiff and Plaintiff
12		pushed him away, this incident happened a
13		couple of months before Plaintiff's resignation.
14		Ms. Ingram will testify about a promotion
15		given to her and questions and answers given
16		to her by Stites for the job interview. Ms.
17		Ingram also will testify as to inappropriate
18		sexual E-mails sent by Stites to another female
19		co-worker Jennifer Thomas. Ms. Ingram will
20		testify as to Plaintiff's emotional distress.
21	Jennifer Thomas	Ms. Thomas is a co-worker of Plaintiff. Ms.
22		Thomas will testify that she worked during the
23		same period as Plaintiff, was sexually harassed
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1		by Norman Stites, and is a percipient witness
2		to Plaintiff's treatment.
3	Jennifer Thomas' mother	Ms. Thomas will testify as to conversations
4		that she had with Norman Stites and comments
5		made about allegations that Stites Sexually
6		harassed her daughter Jennifer Thomas
7		
8	Doug Mino	Mr. Mino was a co-worker of Plaintiff. Mr.
9		Mino was a percipient witness to the
10		allegations of sexual harassment/discrimination
11		toward Plaintiff.
12		
13	Christine Marlow	Ms. Marlow is a co-worker of Plaintiff. Ms.
14		Marlow will testify about favorable treatment,
15		being mentored by Stites.
16		
17	Romona Hadeley	Ms. Hadley was a co-worker of Plaintiff in the
18		same job classification. Ms. Hadley will
19		testify as to favorable treatment she received
20		by Norman Stites (unearned hours, etc.).
21		
22	Jessica Rodriguez	Ms. Rodriguez was a co-worker of Plaintiff in
23		the same job classification. Ms. Hadley will
24		testify as to favorable treatment she received
25		by Norman Stites (unearned hours, etc.).
26		
27	Dale Billings	Mr. Billings is a co-worker of Plaintiff. Mr.
28		Billings will testify to the amount of hours he

1		worked in overtime, after Plaintiff Complained
2		of discrimination.
3	Paul Kacowski	Mr. Kacowski was Plaintiff's co-worker, in
4		the same job classification as Plaintiff. Mr.
5		Kacowski will testify as to the mentorship
6		given to him by Mr. Stites. Mr. Kacowski is
7		currently a Sr. Manager at FedEx.
8		
9	Lou Vigiletti	Mr. Vigiletti was Plaintiff's Sr. Manager for a
10		short time period. Mr. Vigiletti had
11		conversations with Plaintiff regarding the
12		Discrimination/Harassment.
13		
14	Michael Pigors	Mr. Pigors was the Vice President of the
15		Western Region at FedEx, one of Plaintiff's
16		manager, during the time period in question.
17		According to Defendant, Mr. Pigors was
18		instrumental in deciding which facilities to re-
19		organize and was part of Plaintiff's shift
20		change toward the end of her employment.
21		Mr. Pigors also can testify as to the financial
22		condition of FedEx during that time period and
23		can authenticate the SEC 10K filings.
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25	Mike Golden	Mr. Golden was a Sr. Manager of FedEx and
26		disciplined Mr. Stites for making an
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1		inappropriate sexual gesture (with his hand) to
2		an employee.
3	Ray Marino	Mr. Marino was an employee at FedEx and
4		made a complaint about a inappropriate sexual
5		gesture (with his hand) that Stites made to him
6		during his employment..
7		
8	Stan Stephenson	Mr. Stephenson is Plaintiff's expert economist
9		and will testify as to her wage loss and other
10		losses of economic benefits.
11		
12	Florence Wandisan, M.D.	Dr. Wandisan will testify to treating Plaintiff
13		for migraine headaches during the period in
14		question.
15		
16	Ukeitha Thomas	Ms. Thomas was a co-worker of Plaintiff. Ms.
17		Thomas was a percipient witness to the
18		allegations of sexual harassment/discrimination
19		against Plaintiff.
20		
21	Gary Yen	Mr. Yen was a co-worker of Plaintiff. Mr. Yen
22		was a percipient witness to the allegations of
23		sexual harassment/discrimination against
24		Plaintiff.
25		
26	Eric Lai	Mr. Lai was a co-worker of Plaintiff. Mr. Lai
27		was a percipient witness to the allegations of
28		sexual harassment/discrimination against

1		Plaintiff.
2		
3	Michael Synder	Mr. Synder will be a rebuttal witness as he will
4		testify to inappropriate sexist statements made
5		by Micheal Pigors.
6		
7	Claudia Miller	Ms. Miller was a co-worker of Plaintiff. Ms.
8		Miller will speak about the operations of the
9		facility that Plaintiff worked and will speak
10		about the emotional distress that Plaintiff
11		suffered due to the wrongful acts of the
12		Defendant.
13		
14	Christopher Perry	Mr. Perry is a close friend of Plaintiff. Mr.
15		Perry will speak to Plaintiff's emotional
16		Distress during the period in question.
17		
18	Anetha DeCong	Ms. DeCong is a close relative of Plaintiff.
19		Ms. DeCong will speak to Plaintiff's emotional
20		Distress during the period in question.
21		
22	Jeff Davis	Mr. Davis is a close friend of Plaintiff. Mr.
23		Davis will speak to Plaintiff's emotional
24		Distress during the period in question.
25		
26	Charlotte Boswell	Plaintiff will testify to the allegations of
27		harassment, sex discrimination, constructive
28		discharge and retaliation. Plaintiff will testify

to the emotional distress suffered.

Dated: September 25, 2006

LAW OFFICES OF WAUKEEN Q. McCOY

/S/ Waukeen McCoy

By _____

WAUKEEN Q. McCOY
ATTORNEYS FOR PLAINTIFF
CHARLOTTE BOSWELL